



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
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NEW YORK  
REGIONAL OFFICE

January 21, 2025

**VIA ECF**

The Honorable Sanket J. Bulsara  
United States District Judge  
United States District Court for the New York Eastern District  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: SEC v. NanoBit Limited, et al., 2:24-cv-06517-JSB-ST**

Dear Judge Bulsara:

Plaintiff Securities and Exchange Commission (“SEC”) respectfully submits this letter in response to the Court’s January 15, 2025, Order asking the SEC to explain why “the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur[red] in Nassau or Suffolk County” as described in the SEC’s civil cover sheet.

A substantial part of the events giving rise to the SEC’s claims occurred in Suffolk County because two of the Defendants, Hua Zhao and Zhao Tropical Deli Inc., are located in Amityville, New York. The SEC’s Complaint alleges that, in connection with the fraudulent scheme, investor funds were sent to these Defendants in Amityville. Furthermore, at least one victim of the alleged fraud is located in Shirley, New York. As such, Defendants’ fraudulent representations were directed to Shirley. Both Amityville and Shirley are in Suffolk County.

Respectfully submitted,

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